

TODD W. BAXTER
Admitted Pro Hac Vice
McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP
8337 West Sunset Road, Suite 350
Las Vegas, Nevada 89113
Telephone: (702) 949-1100
Facsimile: (702) 949-1101
dylan.todd@mccormickbarstow.com
todd.baxter@mccormickbarstow.com

ERON Z. CANNON
Nevada Bar No. 8013
FAIN ANDERSON VANDERHOEF
ROSENDAHL O'HALLORAN SPILLANE PLLC
701 5th Avenue #4750
Seattle, Washington 98104
Telephone: (206) 749-0094
Facsimile: (206) 749-0194
eron@favros.com

Attorneys for Plaintiffs/Counterdefendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ALLSTATE INSURANCE COMPANY,
ALLSTATE PROPERTY & CASUALTY
INSURANCE COMPANY, ALLSTATE
INDEMNITY COMPANY, and ALLSTATE
FIRE & CASUALTY INSURANCE
COMPANY,

Plaintiffs,

v.

RUSSELL J. SHAH, MD, DIPTI R. SHAH,
MD, RUSSELL J. SHAH, MD, LTD., DIPTI
R. SHAH, MD, LTD., and RADAR
MEDICAL GROUP, LLP dba UNIVERSITY
URGENT CARE, DOES 1-100, and ROES
101-200,

Defendants.

AND RELATED CLAIMS

CASE NO. 2:15-cv-01786-APG- DJA

**STIPULATION FOR EXTENSION OF
TIME FOR PLAINTIFFS/COUNTER-
DEFENDANTS TO RESPOND TO THE
RADAR PARTIES' MOTION TO
COMPEL THE ALLSTATE PARTIES'
RESPONSES TO DISPUTED
DISCOVERY REQUESTS**

2:15-cv-01786-APG-CWH

STIPULATION FOR EXTENSION OF TIME FOR PLAINTIFFS TO FILE OPPOSITION TO THE RADAR
PARTIES' MOTION TO COMPEL THE ALLSTATE PARTIES' RESPONSES TO DISPUTED DISCOVERY
REQUESTS

1 Plaintiffs/Counter-defendants ALLSTATE INSURANCE COMPANY, ALLSTATE
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,
3 and ALLSTATE FIRE & CASUALTY INSURANCE COMPANY (collectively, the “Allstate
4 Parties”), and Defendants and Counterclaimant RUSSELL J. SHAH, M.D., DIPTI R. SHAH, M.D.,
5 RADAR MEDICAL GROUP, LLP dba UNIVERSITY URGENT CARE, RUSSELL J. SHAH,
6 MD, LTD., and DIPTI R. SHAH, MD, LTD. (collectively referred to as the “Radar Parties”), by
7 and through their respective counsel of record, hereby stipulate and agree as follows:

8 1. On May 13, 2022, the Radar Parties filed their Motion to Compel the Allstate Parties’
9 Responses to Disputed Discovery Requests (“Motion”) [ECF No. 430].

10 2. The Allstate Parties presently have until May 27, 2022 to file their opposition.

11 3. Due to the Allstate Parties’ counsel’s work schedule during the weeks of May 16,
12 2022 and May 23, 2022, the Allstate Parties shall now have until June 3, 2022 to file their opposition.

13 ///

14 ///

15 ///

16

17

18

19

20

21

22

23

24

25

26

27

28

4. This is the first stipulation for an extension of time to file an Opposition to the Motion. This stipulation is made in good faith and not to delay the proceedings.

IT IS SO STIPULATED.

Dated: May 23, 2022.

Dated: May 23, 2022.

McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

BAILEY KENNEDY

By: /s/ Todd W. Baxter

By: /s/ Joshua P. Gilmore

TODD W. BAXTER, ESQ.
Admitted Pro Hac Vice
8337 West Sunset Road, Suite 350
Las Vegas, Nevada 89113

DENNIS L. KENNEDY, ESQ.
Nevada Bar No. 1462
JOSEPH A. LIEBMAN, ESQ.
Nevada Bar No. 10125
JOSHUA P. GILMORE, ESQ.
Nevada Bar No. 11576
8984 Spanish Ridge Avenue
Las Vegas, Nevada 89148
*Attorneys for Defendants &
Counterclaimant*

ERON Z. CANNON, ESQ.
Nevada Bar No. 8013
FAIN ANDERSON VANDERHOEF
ROSENDAHL O'HALLORAN
SPILLANE, PLLC
701 Fifth Avenue, Suite 4750
Seattle, Washington 98104
Attorneys for Plaintiffs/Counterdefendants

ORDER

IT IS SO ORDERED.

DATED this 24th day of May, 2022.


UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of May 2022, a true and correct copy of
**STIPULATION FOR EXTENSION OF TIME FOR PLAINTIFFS/COUNTER-
DEFENDANTS TO RESPOND TO THE RADAR PARTIES' MOTION TO COMPEL THE
ALLSTATE PARTIES' RESPONSES TO DISPUTED DISCOVERY REQUESTS [430]** was
served via the United States District Court CM/ECF system on all parties or persons requiring
notice.

By /s/ Helen L. Walton

Helen L. Walton, an employee of
MCCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

003246-001559 8422858.1